

Submission: Summary of Ideas

Cities: CDBG Only Working Group

The purpose of this submission is to summarize the meaningful ideas generated by the Cities: CDBG Only Working Group as part of the ConPlan Improvement Initiative (CPII). These ideas are being forwarded to the CPII Steering Committee with the ultimate objective of forwarding to HUD's Assistant Secretary of Community Planning and Development for consideration and possible action. These ideas may require changes that will be administrative, regulatory or statutory in nature.

Purpose of Cities Working Group

The purpose of the Cities Working Group is to address issues and develop ideas for streamlining the ConPlan process that are of particular relevance to Cities. Two working groups will address City issues—the Cities: CDBG Only WG has participants interested in CDBG-Only Grantee issues and the Cities: CDBG Plus WG consists of participants who administer the CDBG Program plus at least one other CPD formula grant program.

Working Group Profile:

Co-Chairs: Margy Coccodrilli and Kathy Fedler

Members:

Terri Amabisca, Housing & Redevelopment Manager, City of Tempe, AZ.
Jeff Falcusan, Legislative Counsel, National Community Development Association
Michael L. Hanley, Staff Attorney, Greater Upstate Law Project, Inc., Rochester, NY
Ken Black, Community Development Coordinator, Olympia, WA
John Conover, Staff Attorney, Legal Aid Justice Center, Charlottesville, VA
Paula Newcomb, Assistant Director, Community Development Department, Haverhill, MA
Margy Coccodrilli (Co-Chair), CPD Specialist, Office of Block Grants Assistance, HUD, .
Kathy Fedler (Co-Chair), CDBG & Affordable Housing Coordinator, City of Longmont, CO
Ed Talbot, Executive Director, Arvada Housing Authority/ Manager, Housing and
Neighborhood Revitalization, Arvada, CO
Harold Cole, Director, CPD Birmingham Field Office, Birmingham, AL
Sue Guio, Community Services Coordinator, DeKalb, IL
Pat Heidel, Aspen Systems Corporation, Rockville, MD (Staff support)

Meeting Dates: July 1, July 22, and August 12, 2002

Fast Track Ideas

1. **Access to PHA data** – Many CPD grantees currently do not have access to PHA data that would provide up-to-date information on affordable housing supply and needs.

Discussion: To streamline ConPlan preparation, HUD would assist grantees gain access to the following PHA information: deconcentration data, demolition of PHA units, loss of Section 8 units, families on waiting list, Resident Characteristics Report, and availability of privately owned, affordable rental units. CPD should work with PHA to ensure grantees can get the data needed to prepare the ConPlan.

2. **Consistent terminology across CPD Programs (CDBG, HOME, ESG, and HOPWA)**

Discussion: The ConPlan, Annual Plan, and CAPER should use consistent terminology, including definitions for income categories, families-households, and definitions of “units.” This will enable grantees to accurately and consistently report on “units” (beds, houses, households, jobs, bed-nights, linear feet, etc) for planned and completed activities and for chronic homelessness. CPD also needs consistent measurement for job training programs.

3. Same due dates for ConPlan and PHA Plans

Discussion: ConPlans and PHA Plans should have the same submission date. This would reduce administrative burdens of dual agencies that administer both CPD and PHA funds. Currently, PHA plans have 45-day public comment periods and are due to HUD within 75 days of end of the agency’s fiscal year. Consolidated Plans have a 30-day public comment period and are due 45 days before the grantee’s program years begin. This means that dual agencies that administer cannot integrate their planning activities. If HUD department makes the time cycles for PHA plans and ConPlans consistent, local agencies can use their time and resources more efficiently.

4. Streamline certifications

Discussion: Requiring one signature for all certifications, rather than separate signature for each certification, would streamline the ConPlan and reduce administrative burdens. As part of a ConPlan template, the section on certifications would indicate attachments that would be useful to grantee and the public. Template should also clarify requirements for each certification. There was discussion that it is important that grantees are carrying out the requirements for the certifications.

Pilot Recommendations

1. Pilot 1 – Develop a ConPlan template for a dual agency that must prepare and submit both a ConPlan and PHA Plan. Drawing on Fast Track Recommendation 3, dual agencies would be able to submit ConPlan and PHA plans on same date when they are do in the same program year.

Discussion: Develop a ConPlan template modeled on the PHA plan template that has check boxes and other simplifications. Since it is important that HUD does not mandate a one-size-fits-all approach, the template would be *minimum requirement* that communities can build upon. Allow addenda to cover additional submission.

- Goal: Streamlining ConPlan and reducing administrative burden.
- Volunteer: Tempe, AZ

2. Pilot 2 – Develop ConPlan template for grantees that receive only CDBG funds.

Discussion: Since many components of the ConPlan address HOME, ESG, and HOPWA funding, it is important to develop a streamlined ConPlan for communities receiving only CDBG funds. As with Pilot 1, this pilot involves developing a ConPlan template modeled on the PHA plan template that has check boxes and other simplifications. Since it is important that HUD does not mandate a one-size-fits-all approach, the template would be *minimum requirement* that communities can

build upon. Allow addenda to cover additional submission. A similar template could be developed for the few HOME-only grantees.

- Goal: Streamlining ConPlan.
- Volunteer: Olympia, WA.

Performance Measurement Issues and Recommendations

1. Simplify CAPER

Discussion: Particularly for smaller grantees, the existing CAPER is often burdensome and needs to be simplified, for example as a matrix template. HUD needs to provide performance measurement for job training programs.

General Discussion Ideas

1. Consistency of Field Office review of ConPlans

Discussion: Participants discussed their own experiences with the consistency of ConPlan review and sign off by different offices within HUD. Do different Field Offices have different routing and review procedures? How has this changed in recent years when HUD staffing has declined in the Field Offices?

2. Improving citizen participation

Discussion: General agreement that we need to improve citizen participation process but no agreement on changing length of comment period. Some suggestions for pilots, such as a simplified template, would make ConPlan easier to understand.